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November 9, 2017

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

**Re: Ex Parte Notice
WC Docket No. 17-84**

Dear Ms. Dortch:

On November 7, 2017, Mike Tautphaeus (Joint Use Manager, Ameren), Karen Flewharty (Joint Use Manager, Oncor Electric), Eric Langley and I met with the following members of the Wireline Competition Bureau in connection with the above-referenced docket: Annick Banoun, Adam Copeland, Lisa Hone, Dan Kahn, and Michael Ray (by telephone).

During the meeting, we urged the Commission to continue to protect electric utilities' right to adopt standards that exceed the NESC. In addition, we advocated that the Commission should not reduce the current 45-day survey period to 15 days. The benefit of any small shortening of the access timeline would be vastly outweighed by the threat to safety and reliability because this 45-day period is the utilities' opportunity to properly engineer the proposed attachments (for the benefit of all stakeholders). We also shared our view that one-touch make-ready ("OTMR") in the communications space is the most effective vehicle for the Commission to make large strides in speeding the deployment of broadband. However, the Commission should not adopt a force-placed regulatory requirement allowing for OTMR in the power space; any OTMR in the power supply space should be voluntary and negotiated.

We also urged the Commission to continue to allow electric utilities to require advanced notice of overloading. Such advanced notice is essential in order for electric utilities to ensure that (1) the additional load imposed by the overloading meets the electric utilities' standards for safety, reliability, and engineering, and (2) there is no existing violation of the electric utilities' standards or applicable codes on the pole that must be remedied prior to the proposed overloading. Ms. Flewharty stated that

in 2016, Oncor Electric received advance notice of overlashing on 5,186 poles, 716 of which had pre-existing violations for failure to observe NESC requirements for clearance between communications attachments and power facilities. Overlashing into a violation can pose a danger to the communications worker that is performing such overlashing and risk compounding safety threats to workers and the public posed by such pre-existing violations.

Enclosed herewith are photographs we used as a demonstrative in the meeting as an example of an attacher overlashing without notice into an existing violation (failure to meet NESC requirements for clearance over roadway) in Ameren's service territory in St. Louis. Also enclosed are photographs of strand-mounted wireless equipment, which we used as a demonstrative to illustrate why electric utilities need advanced notice of equipment deployed on the strand (even if it is not technically attached to the pole).

The positions and data we discussed in our meeting were consistent with the positions and data set forth in the initial comments and reply comments filed by Ameren and Oncor Electric (along with AEP, Duke Energy, Entergy, Southern Company, and Tampa Electric) in this proceeding.

This ex parte notification is being filed electronically in the above-referenced docket pursuant to section 1.1206(b) of the Commission's rules. Please let me know if you have any questions.

Very Truly Yours,

/s/ Robin F. Bromberg

Robin F. Bromberg

cc: Annick Banoun (annick.banoun@fcc.gov)
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Enclosures



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